## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:	)	Chapter 11
	)	
W.R. Grace & Co., et al.,	)	Case No. 01-1139 (JKF)
	)	(Jointly Administered)
Debtors.	)	Objection Deadline: 1/11/08 at 4:00 p.m.
	)	Hearing Date: 1/28/08 at 1:00 p.m.

## NOTICE OF MOTION OF THE CITY OF CHARLESTON, SOUTH CAROLINA FOR RELIEF FROM THE AUTOMATIC STAY

## TO: SEE ATTACHED SERVICE LIST

The City of Charleston, South Carolina ("Movant") has filed a Motion for Relief from Automatic Stay ("Motion") which seeks relief from that automatic stay to permit Movant to proceed with its exercise of its sovereign right of eminent domain as to certain real property owned by the above-captioned debtors.

HEARING ON THE MOTION WILL BE HELD ON January 28, 2007 at 1:00 p.m. before the Honorable Judith K. Fitzgerald in the United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, Wilmington, Delaware 19801.

You are required to file a response to the Motion on or before **January 11, 2008** at **4:00 p.m.** At the same time, you must also serve a copy of the response upon Movant's attorneys:

Karen C. Bifferato, Esquire Christina M. Thompson, Esquire Connolly Bove Lodge & Hutz LLP The Nemours Building 1007 N. Orange Street P.O. Box 2207 Wilmington, Delaware 19899 Telephone: (302) 658-9141 Telecopy: (302) 658-0380

-and-

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The hearing date specified above may be a preliminary hearing or may be consolidated with the final hearing, as determined by the Court.

The attorneys for the parties shall confer with respect to the issues raised by the motion in advance for the purpose of determining whether a consent judgment may be entered and/or for the purpose of stipulating to relevant facts such as value of the property, and the extent and validity of any security instrument.

DATED: December 21, 2007 CONNOLLY BOVE LODGE & HUTZ LLP

## /s/ Christina M. Thompson

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Attorneys for the City of Charleston, South Carolina

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